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November 1, 2023

BY ECF

Honorable Valerie Figueredo
United States Magistrate Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: ***KMS Tech Inc. v. G Mission Inc. et al.***
Case No. 1:20-cv-01041-GBD-DCF

Your Honor:

We represent Defendants/Counterclaim Plaintiffs G Mission, Inc. and Jake Kwak (“Defendants”) in the above-captioned matter. We write pursuant to Your Honor’s Order of October 3, 2023 directing the parties to file a joint letter updating the Court of the status of expert discovery. Having met and conferred on October 17, 2023 and October 19, 2023 via Zoom, the parties jointly request that the Court hold a telephone conference to address the scope of expert discovery and the attorney’s fees Plaintiff KMS Tech, Inc., is required to remit to Defendants pursuant to your Orders of February 14, 2023 and August 7, 2023.

Respectfully submitted,

/s/ Maurice N. Ross

Maurice N. Ross

*Counsel for the Defendants/Counterclaim
Plaintiffs*